

May 7, 2024

Hon. Magistrate Parker
United State District Court, S.D.N.Y.
500 Pearl Street, Courtroom 17D
New York, NY 10007

RE: motion for extension under Rule 6

VIA: electronic submission through *Pro-Se* Intake Unit

Your Honor,

I am the *pro-se* Plaintiff in the above-mentioned matter, hereinafter referred to in first person or as “Plaintiff.”

It is unclear if May 7th, the Court’s tentative discovery closure date, is also the date on which any updated Responses to Request for Production, updated interrogatory responses, additional production, or any updated disclosures are due, particularly given that, e.g.,

- Requests to admit have only just gone out and are due to come in by June 7th (see April 24th Court order) (Additionally, interrogatories on Spicer and Priebus, also ordered by the Court, are not due back until May 26th)
- Depositions were still happening the day of;
- Document production (court-ordered) from Defendants was still coming in in the evening of May 7th;
- Plaintiff currently has no bates-stamp software but is working on obtaining same;
- Fox News subpoena matter is yet to be resolved; and
- Don McGahn motion to quash matter is being heard by a D.C. Court (most recent hearing last month); etc.

As such, the Plaintiff respectfully requests, per Rule 6, an extension on the aforementioned matters that may be due.

Respectfully submitted,
s/Arlene Delgado
Arlene Delgado
Plaintiff, pro-se